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8 Attorney for Michael Canatella

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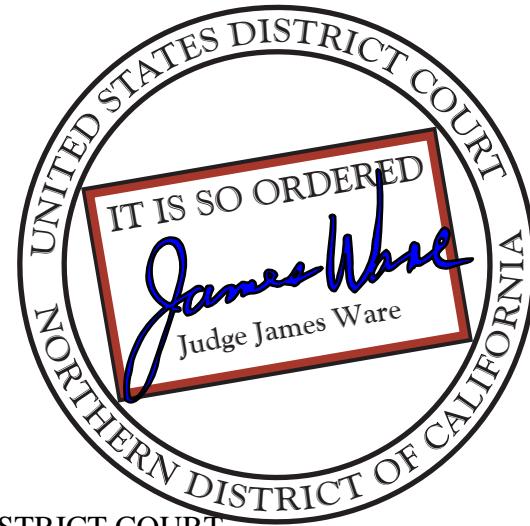
UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

1 UNITED STATES OF AMERICA, ) No. CR-00-00303-JW  
2 Plaintiff, )  
3 Vs. ) STIPULATION AND ~~PROPOSED~~  
4 MICHAEL CANATELLA, ) ORDER CONTINUING  
5 Defendant. ) SENTENCING DATE  
6 ) Honorable James Ware  
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Defendant Michael Canatella, by and through his attorney, Steven F. Gruel, and the United States of America, by and through his attorney, David Hall, hereby requests that the sentencing hearing set for July 11, 2011, be continued to October 31, 2011. The defendant is not in custody.

The basis for this stipulation is that the prosecutor, who handled this case from the inception, recently returned to the United States from a year long government detail to Iraq on behalf of the United States Justice Department and is in discussions with defense counsel regarding the government's sentencing recommendation. This discussion is critical because Mr.

*STIPULATION AND ~~PROPOSED~~ ORDER CONTINUING SENTENCING DATE*



1 Canatella provided cooperation with the prosecution and expects a government motion for a  
2 downward departure motion pursuant to 5K1.1 of the United States Sentencing Guidelines.  
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4 Also, the defense and the United States Probation Officer have ongoing discussions  
5 regarding the Probation Officer's sentencing recommendation as well as discussions regarding  
6 the presentence report.  
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8 SO STIPULATED:  
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10 DATED: 07/06/11

11 \_\_\_\_\_/s/ \_\_\_\_\_  
12 STEVEN F. GRUEL  
13 Attorney for Michael Canatella  
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15 DATED: 07/06/11

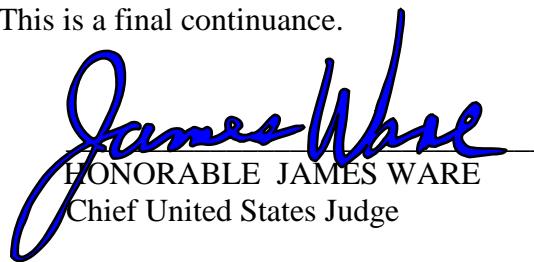
16 \_\_\_\_\_/s/ \_\_\_\_\_  
17 DAVID HALL  
18 Assistant United States Attorney  
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20 **PROPOSED ORDER**

21 PREDICATED on the above stipulation and GOOD CAUSE APPEARING,  
22 defendant Michael Canatella's sentencing hearing is hereby continued to October 31, 2011.  
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24 IT IS SO ORDERED. This is a final continuance.  
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26 DATED: 7/7/11

27   
28 HONORABLE JAMES WARE  
29 Chief United States Judge  
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31 *STIPULATION AND **PROPOSED** ORDER CONTINUING SENTENCING DATE*